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8 *Attorneys for Plaintiff*  
9 *Entropic Communications, LLC*

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12  
13 ENTROPIC COMMUNICATIONS,  
14 LLC,

15 Plaintiff,

16 v.

17 COMCAST CORPORATION;  
18 COMCAST CABLE  
19 COMMUNICATIONS, LLC; and  
20 COMCAST CABLE  
COMMUNICATIONS  
MANAGEMENT, LLC

21 Defendants.

22  
23 ENTROPIC COMMUNICATIONS,  
24 LLC,

25 Plaintiff,

26 v.

27 COX COMMUNICATIONS, INC.;  
COXCOM, LLC; and COX

Case No.: 2:23-cv-01050-JWH-KES

**JOINT STATEMENT OF THE  
PARTIES IN RESPONSE TO THE  
ORDER TO SHOW CAUSE RE  
APPOINTMENT OF A SPECIAL  
MASTER**

[Judge John W. Holcomb; Magistrate  
Judge Karen E. Scott]

Date: April 21, 2023

Time: 9:00 a.m.

Crtm: 9D (Reagan Bldg)

Case No.: 2:23-cv-01049-JWH-KES

**JOINT STATEMENT OF THE  
PARTIES IN RESPONSE TO THE  
ORDER TO SHOW CAUSE RE  
APPOINTMENT OF A SPECIAL  
MASTER**

1 COMMUNICATIONS , LLC,  
2 Defendants.

Judge John W. Holcomb; Magistrate  
Judge Karen E. Scott]

Date: April 21, 2023  
Time: 9:00 a.m.  
Crtm: 9D (Reagan Bldg)

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1 Plaintiff Entropic Communications, LLC (“Entropic” or “Plaintiff”), Defendants  
2 Comcast Corporation, Comcast Cable Communications, LLC, and Comcast Cable  
3 Communications Management, LLC (“Comcast Defendants”), and Defendants Cox  
4 Communications, Inc., CoxCom, LLC, and Cox Communications California, LLC  
5 (“Cox Defendants”) (together with the Comcast Defendants, “Defendants”) (jointly  
6 with Plaintiff, the “Parties”) hereby submit the following Joint Statement of the Parties  
7 in Response to the Court’s Order to Show Cause Regarding Appointment of a Special  
8 Master.

9 **ENTROPIC’S POSITION**

10 Plaintiff consents to the appointment of a special master in this matter for  
11 discovery purposes and agrees that the appointment of a special master will promote  
12 the expeditious resolution of the Parties’ anticipated discovery disputes. For the Court’s  
13 consideration, Plaintiff proposes David Keyzer as an exemplary candidate for  
14 appointment as a special master.

15 **DEFENDANTS’ POSITION**

16 Although Defendants do not anticipate any discovery disputes, they consent to  
17 the appointment of a special master in this matter for discovery purposes in order to  
18 promote the expeditious resolution of any discovery dispute that may arise. Defendants  
19 will be prepared to discuss specific proposals for a special master at the April 21st  
20 conference.

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3 **SIGNATURE CERTIFICATION**

4 Pursuant to L.R. 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest that all other  
5 signatories listed herein and on whose behalf the filing is submitted concur in the  
6 filing's content and have authorized the filing.

7

8

9 **K&L GATES LLP**

10 Dated: April 14, 2023

11 By: s/ Christina N. Goodrich  
Christina Goodrich

12 Attorneys for Plaintiff Entropic  
13 Communications, LLC

14 Dated: April 14, 2023

15 **WINSTON & STRAWN**

16 By: s/ Krishnan Padmanabhan  
17 Krishnan Padmanabhan

18 Attorneys for Defendants  
19 Comcast Corporation; Comcast Cable  
20 Communications, LLC; and Comcast  
21 Cable Communications Management, LLC

22 Dated: March 14, 2023

23 **KILPATRICK TOWNSEND &**  
24 **STOCKTON LLP**

25 By: s/ April E. Isaacson  
26 April E. Isaacson

27 Attorneys for Defendants  
28 Cox Communications, Inc.;  
CoxCom, LLC; and Cox  
Communications California, LLC